

Michael H. Juba
Director Product Safety & Occupational Health



Koppers Inc.
436 Seventh Avenue
Pittsburgh, PA 15219-1800
Tel 412 227 2882
Fax 412 227 2423
JubaMH@koppers.com
www.koppers.com

December 12, 2011

Moana Appleyard
Chemical Review Manager
Risk management and Implementation Branch 5
Pesticide Re-Evaluation Division 7508P
Office of Pesticide Programs
US Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Product Specific Data Call-In Notice for Coal Tar Creosote Case 0139

Dear Ms. Appleyard:

Enclosed with this letter is Koppers 90-Day response to the Product Specific Data Call-In Notice received on September 26, 2011. Koppers Inc. is a member of Creosote Council III, EPA Joint Data Consortium and EPA Company Number 63700. This letter addresses the product specific response for Koppers creosote registrations (61468-1, 61468-3, 61468-6 and 61468-9) and consists of:

- 1) EPA Data call-In Response Form.
- 2) Requirements Status and Registrant's Response Form.
- 3) Product Specific Response Table 1, DCI Response Rationale.
- 4) Confidential Statement of Formula for each registered creosote product.

Please address any questions about this response to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael H. Juba".

Michael H. Juba

cc: John H. Butala, Creosote Council III
Lawrence S. Ebner, Creosote Council
Mark A. Harman, EPA
Jacqueline Campbell-McFarlane, EPA

Enclosure(s)

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-174

DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address KOPPERS INC 436 SEVENTH AVENUE, K-1800 PITTSBURGH, PA 152191800		2. Case # and Name 0139 Coal Tar/Creosote Chemical # and Name 025004 Coal tar creosote		3. Date and Type of DCI and Number 22-Sep-2011 PRODUCT SPECIFIC ID # PDCI-025004-30247	
4. EPA Product Registration	5. I wish to cancel this product regis- tration volun- tarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA regis- tration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
61468-1		N.A.	N.A.		Yes
61468-3		N.A.	N.A.		Yes
61468-6		N.A.	N.A.		Yes
61468-9		N.A.	N.A.	Yes	Yes
8. Certification I certify that the statements made on this form and attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.					
Signature and Title of Company's Authorized Representative <i>[Signature]</i>				9. Date 12 December 2011	
10. Name of Company KOPPERS INC.				11. Phone Number 412 227-2882	

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Agency Washington, D.C. 20460

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address KOPPERS INC 436 SEVENTH AVENUE, K-1800 PITTSBURGH, PA 152191800		2. Case # and Name 0139 Coal Tar/Creosote EPA Reg. No. 61468-6			3. Date and Type of DCI and Number 22-Sep-2011 PRODUCT SPECIFIC ID # PDCI-025004-30247					
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response	
			1	2	3					
Product Chemistry Data Requirements (Antimicrobial)										
830.1550	Product Identity and composition (11)					BB	EP; MP; TGAI	8	6	
830.1600	Description of materials used to produce the product (10)					BB	EP; MP; TGAI	8	1	
830.1620	Description of production process (9)					BB	TGAI	8	1	
830.1650	Description of formulation process (8)					BB	EP; MP	8	1	
830.1670	Discussion of formation of impurities (7)					BB	EP; MP; TGAI	8	1	
830.1700	Preliminary analysis (6,12,13)					BB	TGAI	8	6	
830.1750	Certified limits (5)					BB	EP; MP; TGAI	8	1	
830.1800	Enforcement analytical method (4)					BB	EP; MP; TGAI	8	6	
830.6302	Color (14)					BB	EP; MP; TGAI	8	6	
830.6303	Physical state (15)					BB	EP; MP; TGAI	8	6	
830.6304	Odor (16)					BB	EP; MP; TGAI	8	6	
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date 12 December 2011			
Signature and Title of Company's Authorized Representative <i>Michael N. Guba</i>							13. Phone Number 412 287-2882			
12. Name of Company Koppers Inc.										

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1. Company Name and Address

KOPPERS INC
436 SEVENTH AVENUE, K-1800
PITTSBURGH, PA 152191800

2. Case # and Name

0139 Coal Tar/Creosote

EPA Reg. No. 61468-6

3. Date and Type of DCI and Number

22-Sep-2011
PRODUCT SPECIFIC
ID # PDCI-025004-30247

4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.6313	Stability to normal and elevated temperatures, metals, and metal ions (3, 17, 18)					BB	TGAI	8	6
830.6314	Oxidizing or reducing action (19)					BB	EP; MP	8	8
830.6315	Flammability (20)					BB	EP; MP	8	8
830.6316	Explosibility (21)					BB	EP; MP	8	8
830.6317	Storage stability (58)					BB	EP; MP	16	6
830.6319	Miscibility (22)					BB	EP; MP	8	8
830.6320	Corrosion characteristics (59)					BB	EP; MP	16	6
830.6321	Dielectric breakdown voltage (23)					BB	EP; MP	8	8
830.7000	pH (24, 25)					BB	EP; MP; TGAI	8	8
830.7050	UV/Visible absorption					BB	PAI; TGAI	8	7
830.7100	Viscosity (26)					BB	EP; MP	8	6
830.7200	Melting point/melting range (27, 28)					BB	TGAI	8	8

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

12 Dec 2011

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			1	2	3				
830.7220	Boiling point/boiling range (29 ,30)					BB	TGAI	8	6
830.7300	Density/relative density (31 ,32)					BB	EP; MP; TGAI	8	6
830.7370	Dissociation constants in water (33 ,34)					BB	PAI; TGAI	8	8
830.7550	Partition coefficient (n-octanol/water), shake flask method (35)					BB	PAI; TGAI	8	6
830.7560	Partition coefficient (n-octanol/water), generator column method (56 ,57)					BB	TGAI or PAI	8	7
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography (36)					BB	PAI; TGAI	8	7
830.7840	Water solubility: Column elution method, shake flask method (37)					BB	PAI; TGAI	8	8
830.7860	Water solubility, generator column method (38)					BB	PAI; TGAI	8	8
830.7950	Vapor pressure (39 ,40)					BB	PAI; TGAI	8	6
<u>Toxicology Data Requirements (Antimicrobial)</u>									
870.1100	Acute Oral Toxicity (2 ,41 ,42)					BB	EP; MP; TGAI	8	6
870.1200	Acute dermal toxicity (1 ,43 ,44 ,45)					BB	EP; MP; TGAI	8	6
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			1	2	3				
870.1300	Acute inhalation toxicity (46 ,47 ,48 ,49)					BB	EP; MP; TGAI	8	6
870.2500	Acute dermal irritation (50 ,51 ,52 ,53)					BB	EP; MP; TGAI	8	6
870.2600	Skin sensitization (54 ,55)					BB	EP; MP; TGAI	8	6
870.2400	Acute eye irritation					BB	EP; MP; TGAI	8	6

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(full text of certification is on page one).

Date

12 December 2011